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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In Re:

KIMBERLY YAVONNE BUSTAMANTE,

Debtor(s).

**Case No: BK-S-18-16305-MKN
Chapter 13**

**Hearing Date: June 5, 2019
Hearing Time: 1:30 p.m.**

OPPOSITION TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

COMES NOW, Kimberly Yavonne Bustamante (“Debtor”), by and through her attorneys George Haines, Esq. and Benjamin Chambliss, Esq., of the law firm of HAINES & KRIEGER, LLC, and in opposition to the Motion for Relief from the Automatic Stay filed by eNational Realty Group (“Creditor”), hereby states as follows:

1. Debtor filed her petition for Chapter 13 bankruptcy relief on October 19, 2018.
See Docket #1.
2. Since that time, Debtor has been renting where she currently resides at 6758 Flamenco Ct., Las Vegas, Nevada, 89139 (the “Property”).
3. On May 1, 2019, Creditor filed a Motion for Relief from the Automatic Stay with respect to the Property. See Docket #42.

1 4. Creditor's Motion asserts that Debtor failed to pay full rent for the months of
2 November and December, 2018, and that she paid no rent for April, 2019.

3 5. Debtor asserts that the payments for December and November, 2018, were indeed
4 made to Creditor, and she is in the process of collecting documentation to demonstrate this.

5 6. Regarding the payment for April, 2019, Debtor mailed this payment via Western
6 Union. She has been working with Western Union to determine whether the payment was
7 cashed, and by whom, but has not yet received confirming information from Western Union.

8 7. Debtor is currently looking for another place to live. Granting of this Motion
9 would likely result in summary eviction proceedings being taken against Debtor, which would
10 not afford her enough time to find a new place to live.

11 8. Debtor simply asks that the hearing on this Motion be continued so she can
12 provide documents demonstrating that the payments were made. Alternatively, should such
13 documentation be produced prior to the hearing, Debtor asks that the instant Motion be denied.

14 WHEREFORE, Debtor respectfully requests that the instant Motion be denied, or in the
15 alternative that the hearing on this Motion be continued to allow her a reasonable opportunity to
16 collect proof that the allegedly missed payments were indeed made.

17 DATED this 22nd day of May, 2019.

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19 /s/ Benjamin M. Chambliss, Esq.
20 Benjamin Chambliss, Esq.
21 Haines & Krieger, LLC
22 *Attorneys for Debtor*
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